Commonwealth of Kentucky

Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601

(502) 573-3382

STATE ORIGIN AIR QUALITY PERMIT

Permittee Name: Dana Corporation

Spicer Heavy Axle and Brake Division

Mailing Address: 1320 West Main Street

Glasgow, Kentucky 42141

Source Name: Dana Corporation
Mailing Address: Same as above
Source Location: Same as above

Source ID #: 21-009-00005

Agency Interest #: 67

Regional Office: Bowling Green Regional Office

Bill Blacketer, Supervisor 1508 Western Avenue

Bowling Green, Kentucky 42104-3356

(270) 746-7475

FAX: (270) 746-7865

County: Barren

Permit Number: S-02-118 (Revision 1)

Activity ID: APE20040001

Permit Type: Minor Source Construction/Operating

Application

Complete Date: December 12, 2002
Issuance Date: January 21, 2003
Revision Date: March 18, 2005
Expiration Date: January 21, 2008

John S. Lyons, Director Division for Air Quality Permit Number: S-02-118 (Revision 1) Page: 2 of 16

SECTION A -PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify an affected facility without first having submitted a complete application and receiving a permit for the planned activity from the Division, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

4-Stage Washer, construction commenced: 1 December 1992 **5-Stage Washer**, construction commenced: 1 December 1992

Description: The emission points are parts washers using washing fluid and powered by natural gas.

Annual hours of operation: 8760 hours/year Make/Model: Ransohoff None

Emission Sources: Source 07:	Max Throughputs:	Pollutants:
Washing fluid	3 gal/hr	KOH, PM10, PT
Dust shield	1 gal/hr	PM10, PT
Natural gas	3000 ft ³ /hr	CO, NO ₂ , PM10, PT, SO ₂ , VOC
Source 30:		
Washing fluid	1.00 gal/hr	KOH, PM10, PT
Dust shield	1.00 gal/hr	PM10, PT
Natural gas	$1000 \text{ ft}^3/\text{hr}$	CO, NO ₂ , PM10, PT, SO ₂ , VOC

17 (058)	Hobart-Eaton Welder, construction commenced: 5 January 1988
18 (058)	Hobart-Eaton Welder, construction commenced: 5 January 1988
19 (058)	Hobart-Eaton Welder, construction commenced: 5 January 1988
33 (059)	Hobart-Eaton Welder, construction commenced: 18 May 1992
34 (058)	Hobart-Eaton Welder, construction commenced: 18 May 1992
38 (058)	Hobart-Eaton Welder, construction commenced: 18 May 1992
40 (058)	Hobart-Eaton Welder, construction commenced: 23 September 1993
35 (100)	Hobart-Eaton Welder, construction commenced: 24 February 1995

Description: The emission points are welders using steel welding wire.

Annual hours of operation: 8760 hours/year Make/Model: Hobart-Eaton

Control device: None

Emission Sources:	Max Throughputs:	Pollutants:
Source 17:		

Steel welding wire 14 lbs/hr PM10, PT

17 (058) – 35(100) continued

Source 18:

Steel welding wire 59 lbs/hr PM10, PT

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

Source 19:

Steel welding wire 66 lbs/hr PM10, PT

Source 33, 34, 38, 40:

Steel parts processing 50 pieces/hr PM10, PT, Mn, Cu

Source 45:

Steel parts processing 8 lbs/hr PM10, PT

32 (-) <u>11 Cin-Mil T-20 Machining</u> (construction commenced: 9 March 1992)

Description: The emission point is a machining unit with gallon filtration system.

Annual hours of operation: 8760 hours/year

Make/Model: Cin-Mil Control device: None

Emission Sources: Max Throughputs: Pollutants:

Steel parts production 0.476 gal/hr PM10, PT, Mn, Cu

37 (036) <u>Dog Collar Welders,</u> construction commenced: 9 February 1993

Description: The emission point is a welder using copper welding wire.

Annual hours of operation: 8760 hours/year

Make/Model:TeknoControl device:None

Emission Sources: Max Throughputs: Pollutants: Steel parts processing 10.26 lbs/hr PM10, PT

39 (059) Miller Brake Bracket, construction commenced: 3 April 1993

Description: The emission point is robotic welder using solid steel welding wire.

39 (059) continued

Annual hours of operation: 8760 hours/year Make/Model: Rob Miller None

Emission Sources: Max Throughputs: Pollutants:

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

Steel parts processing 30 lbs/hr PM10, PT, C, Al, Mn, Mo, Cu, Zr

With:

PT – Total particulate matter.

PM10 – Particulate matter equal to or smaller than 10 micrometers.

CO – *Carbon monoxide*.

 NO_2 – Nitrogen dioxide.

 SO_2 – Sulfur dioxide.

VOC – *Volatile organic compounds*.

HAPS – Aluminum (Al), Carbon Black (C), Copper (Cu), Manganese (Mn), Molybdenum (Mo),

Potassium Hydroxide (KOH), Zirconium (Zr),

APPLICABLE REGULATIONS: 401 KAR 59:010 New process operations.

Applicable to visible and particulate emissions from each emission point (listed above) commenced on or after 2 July 1975 as follows:

1. **Operating Limitations:** None.

2. Emission Limitations:

- a. Opacity Standard: Section 3 (1), visible emissions shall not equal or exceed 20 percent opacity, as determined with Reference Method 9, Appendix A 40 CFR 60.
 - i. Compliance demonstration: the permittee shall demonstrate compliance through monitoring and maintenance of the records as specified in points 4. Monitoring Requirements and 5. Recordkeeping Requirements below.
- b. Mass Emission Standard for particulate emissions from all emission points: Section 3 (2), hourly particulate emissions for each emission point as measured by Reference Method 5, Appendix A 40 CFR 60, shall not exceed the limit calculated by the following equation:

$$E = 3.59 P^{0.62}$$

Where E is the particulate emission in lbs/hour and P is the process weight (i.e. the maximum amount of solid scraps/wastes produced or maximum amount of output product) in tons/hour. If the process weight is less than or equal to 0.5 ton/hour, the particulate matter emission limitation shall be 2.34 lbs/hour.

i. Compliance demonstration: Section 4 (5), the process weight shall be determined in average hourly tons by averaging the daily process weight rate over daily hours of operation. Particulate emissions shall be calculated by the following equation:

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

 $E = P \times EF$

Where E is particulate emissions in lbs/hr, P is averaged process weight in tons/hr and EF is the KYEIS particulate emission factor in lbs/ton of process weight.

3. **Testing Requirements:** None

4. Monitoring Requirements:

- a. Opacity Standard: To provide reasonable assurance that the visible emission limitations are being met, the permittee shall:
 - i. Determine the opacity of emissions during operation from each stack or vent by Reference Method 9 quarterly, or more frequently if requested by the Division.
 - ii. Perform a qualitative visual observation of the opacity of emissions from each stack/vent on a weekly basis and maintain a log of the observation. See point 5. Recordkeeping Requirements below.
 - iii. Determine the opacity of emissions by Reference Method 9 if visible emissions from any stack/vent is perceived or believed to exceed the applicable standard.
- b. Mass Emission Standard for particulate emissions from all emission points: To provide reasonable assurance that the particulate matter emission limitations are being met, the permittee shall monitor the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of qualitative visual observations performed. The log shall note:
 - i. Whether any air emissions (except for water vapor) were visible from the vent/stack.
 - ii. All emission points from which visible emissions occurred.
 - iii. Whether the visible emissions were normal for the process.
- b. In addition, the permittee shall keep records of the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.
- 6. **Reporting Requirements:** See SECTION C GENERAL CONDICTIONS, C. Reporting Requirements.

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

O1 (07-11) Rotary Hearth Furnace Line, construction commenced: 1 July 1969

Description: The emission point is a steel-processing rotary furnace and rotary quench tank.

Annual hours of operation: 8760 hours/year

Make/Model: unknown

Control device: Flaring, vapor recovery system

Emission Sources: Max Throughputs: Pollutants:

Furnace:

Natural gas 6000 ft³/hr CO, NO₂, PM10, PT, SO₂, VOC

Quench Tank:

Steel parts processing 200 lbs/hr PM10, PT

O2 (12-16) Super Allcase Furnace Line, construction commenced: 1 July 1969

Description: The emission point is a steel-processing draw furnace and spray washer.

Annual hours of operation: 8760 hours/year

Make/Model: Allcase Control device: Flaring

Emission Sources: Max Throughputs: Pollutants:

Furnace:

Natural gas 5000 ft³/hr CO, NO₂, PM10, PT, SO₂, VOC

Quench Tank:

Steel parts processing 1500 lbs/hr PM10, PT

O3 (23) Forging Press, construction commenced: 1 July 1969

Description: The emission point consists of 2 forging presses processing steel parts.

Annual hours of operation: 8760 hours/year Make/Model: unknown none

03 (23) continued

Emission Sources: Max Throughputs: Pollutants: Steel parts processing 800 lbs/hr PM10, PT

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

O5 (25-27) Phosphating Line, construction commenced: 1 July 1969

Description: The emission point is a process line to phosphate fabricated metal parts.

Annual hours of operation: 8760 hours/year

Make/Model: unknown Control device: none

Emission Sources: Max Throughputs: Pollutants: Steel parts processing 5000 lbs/hr PM10, PT

06 (28-30) 3-Stage Washer, construction commenced: 1 July 1969

Description: The emission point is a spray washer.

Annual hours of operation: 8760 hours/year

Make/Model: Maclead Control device: none

Emission Sources: Max Throughputs: Pollutants: Steel parts processing 5000 lbs/hr PM10, PT

With:

PT – *Total particulate matter.*

PM10 – Particulate matter equal to or smaller than 10 micrometers.

CO – Carbon monoxide. NO₂ – Nitrogen dioxide. SO₂ – Sulfur dioxide.

VOC – *Volatile organic compounds*.

APPLICABLE REGULATIONS: 401 KAR 61:020 Existing process operations.

Applicable to visible and particulate emissions from each emission point (listed above) commenced before 2 July 1975 as follows:

1. **Operating Limitations:** None.

2. Emission Limitations:

a. Opacity Standard: Section 3 (1), visible emissions shall not equal or exceed 40 percent opacity, as

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

determined with Reference Method 9, Appendix A 40 CFR 60.

- i. Compliance demonstration: the permittee shall demonstrate compliance through monitoring and maintenance of the records as specified in points 4. Monitoring Requirements and 5. Recordkeeping Requirements below.
- b. Mass Emission Standard for particulate emissions from all emission points: Section 3 (2), hourly particulate emissions for each emission point as measured by Reference Method 5, Appendix A 40 CFR 60, shall not exceed the limit calculated by the following equation:

$$E = 4.10 P^{0.67}$$

Where E is the particulate emission in lbs/hour and P is the process weight (i.e. the maximum amount of solid scraps/wastes produced or maximum amount of output product) in tons/hour. If the process weight is less than or equal to 0.50 ton/hour, the particulate matter emission limitation shall be 2.58 lbs/hour.

i. Compliance demonstration: Section 4 (1), the process weight shall be determined in average hourly tons by averaging the daily process weight rate over daily hours of operation. Particulate emissions shall be calculated by the following equation:

$$E = P \times EF$$

Where E is particulate emissions in lbs/hr, P is averaged process weight in tons/hr and EF is the KYEIS particulate emission factor in lbs/ton of process weight.

3. **Testing Requirements:** None

4. Monitoring Requirements:

- a. Opacity Standard: To provide reasonable assurance that the visible emission limitations are being met, the permittee shall:
 - i. Determine the opacity of emissions during operation from each stack or vent by Reference Method 9 quarterly, or more frequently if requested by the Division.
 - ii. Perform a qualitative visual observation of the opacity of emissions from each stack/vent on a weekly basis and maintain a log of the observation. See point 5. Recordkeeping Requirements below.
 - iii. Determine the opacity of emissions by Reference Method 9 if visible emissions from any stack/vent is perceived or believed to exceed the applicable standard.
- b. Mass Emission Standard for particulate emissions from all emission points: To provide reasonable assurance that the particulate matter emission limitations are being met, the permittee shall monitor the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of qualitative visual observations performed. The log shall note:
 - i. Whether any air emissions (except for water vapor) were visible from the vent/stack.
 - ii. All emission points from which visible emissions occurred.
 - iii. Whether the visible emissions were normal for the process.
- c. In addition, the permittee shall keep records of the relevant operating parameters, including but not limited to:
 - i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
 - iii. The number of control equipment malfunction and the duration of each occurrence.
- 6. **Reporting Requirements**: See SECTION C GENERAL CONDICTIONS, C. Reporting Requirements.

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SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS AND OPERATING CONDITIONS (CONTINUED)

GROUP REQUIREMENTS:

16 (-) Quench Presses, construction commenced: 30 January 1984

Description: The emission point consists of 12 quench presses.

Annual hours of operation: 8760 hours/year

Make/Model: unknown Control device: none

Emission Sources: Max Throughputs: Pollutants: Steel parts processing 1894 lbs/hr PM10, PT

With:

PT – Total particulate matter.

PM10 – Particulate matter equal to or smaller than 10 micrometers.

APPLICABLE REGULATIONS: 401 KAR 63:010 Fugitive Emissions.

Applicable to visible and particulate emissions from each emission point (listed above) as follows:

- 1. **Operating Limitations:** None.
- 2. **Emission Limitations:** Section (3), fugitive particle emissions shall be controlled in compliance with the regulation.
- 3. **Testing Requirements:** None
- 4. **Monitoring Requirements:** None
- 5. Recordkeeping Requirements: None.
- 6. **Reporting Requirements:** See SECTION C GENERAL CONDICTIONS, C. Reporting Requirements.

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SECTION C – GENERAL CONDITIONS

A. Administrative Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.

- 2. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15].
- 3. Any condition or portion of this permit that becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 11]
- 4. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 4,5]
- 5. This permit does not convey property rights or exclusive privileges. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].
- 6. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 52:040 Section 11(3)]
- 7. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20. (Note include only if subject to federal NSPS or NESHAP standards or 25 TPY in an ozone Nonattainment)
- 8. All previously issued construction and operating permits are hereby subsumed into this permit.

B. Recordkeeping Requirements

- 1. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 52:040 Section 3(1)(f)]
- 2. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be

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SECTION C – GENERAL CONDITIONS

certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

C. Reporting Requirements

1.

- a. In accordance with the provisions of 401 KAR 50:055, Section 1 the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
- b. The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition 1 a) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report. [Material incorporated by reference by 401 KAR 52:040, Section 5, 3].
- 2. The permittee shall furnish information requested by the cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the permit. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].
- 3. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.
- 4. The summary reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21. All deviations from permit requirements shall be clearly identified in the reports.

D. Inspections

- 1. In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
 - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
 - b. To access and copy any records required by the permit.
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times are

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SECTION C – GENERAL CONDITIONS

defined as during all hours of operation, during normal office hours; or during an emergency.

d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

E. Emergencies/Enforcement Provisions

- 1. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Material incorporated by reference by 401 KAR 52:040, Section 1a, 3].
- 2. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- 3. Emergency provisions listed in General Condition E.2 are in addition to any emergency or upset provision contained in an applicable requirement.
- 4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

F. Compliance

- 1. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
 - a. Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
 - b. All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and non routine maintenance performed on each control device.
 - c. A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division.
- 2. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a

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SECTION C – GENERAL CONDITIONS

Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:

- a. Identification of the term or condition;
- b. Compliance status of each term or condition of the permit;
- c. Whether compliance was continuous or intermittent;
- d. The method used for determining the compliance status for the source, currently and over the reporting period, and
- e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
- f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality
Bowling Green Regional Office

1508 Western Ave.

Division for Air Quality
Central Files

803 Schenkel Lane

Proving Green KV 42104 2256

Ereplifort KV 40601 14

Bowling Green, KY 42104-3356 Frankfort, KY 40601-1403

- 3. Permit Shield A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
 - a. Applicable requirements that are included and specifically identified in this permit; or
 - b. Non-applicable requirements expressly identified in this permit.

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SECTION D – INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

Unit Number	Description	Generally Applicable Regulation
08 (01-06)	Two Carburizing Furnaces	None
09 (017-019)	Three Endothermic Atmosphere	None
	Generators	
10 (038)	Heat Exchanger	401 KAR 61:015
11 (045)	Endothermic Atmosphere Generator	401 KAR 53:010
12 (046, 047, 050)	Carburizing Furnaces	401 KAR 53:010
13 (048, 049)	Two Drawing Furnaces	None
14 (-)	Rotary Hardening Furnaces	401 KAR 53:010
16 (-)	Two Quench Presses	401 KAR 63:010
22 (062-063)	Dip Tank & Mix Booth	401 KAR
63:022		
24 (082-084,087-090)	Seven 8000 Gallon Tanks (1-4, 7-9)	None
25 (075-081)	Seven 8000 Gallon Tanks (10-16)	None
26 (073, 074)	Two 8000 Gallon Tanks (17, 18)	None
27 (069-072)	Four 8000 Gallon Tanks (19-22)	None
28 (092, 095)	7500 & 3600 Gallon Tanks (92, 95)	None
29 (085, 086)	Two 8000 Gallon Tanks (5, 6)	None
43 (099)	Heat Exchanger	401 KAR 59:015
44 (100)	Heat Exchanger	401 KAR 59:015